

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KGR HOLDINGS, LLC AND
KPF HOLDINGS, LLC,

Plaintiffs,

V.

JAL EQUITY CORP, KAPPA
GRAPHICS, LLC, and KAPPA
PRODUCT FULFILLMENT
SERVICES, LLC,

Defendants.

C.A. No. 1:25-cv-00101 (MN)-EDT

[PROPOSED] ORDER

WHEREAS, the Court, having considered plaintiffs' motion to compel and defendants' opposition thereto,

IT IS HEREBY ORDERED this _____ day of _____, 2025, that
defendants JAL Equity Corp., Kappa Graphics, LLC, and Kappa Product and Fulfillment Services,
LLC shall:

1. Identify all custodians they believe might have documents responsive to Requests for Production 25, 27 and 29 and manually review those custodians' files for documents responsive to these requests and produce all documents responsive to these requests by _____. If defendants do not locate any documents responsive to these requests, defendants shall so advise plaintiffs by _____;

2. Prepare a Rule 30(b)(6) corporate representative to testify on its behalf regarding the following topics:

- a. JAL's knowledge and interpretation of JAL's obligations under Section 7.9 of the Equity Purchase Agreement;
- b. [JAL, Kappa Graphics and Fulfillment's] knowledge and interpretation of Plaintiffs' obligations under Section 5.5(a)(iii) of the Equity Purchase Agreement;
- c. The reasons why payment was not made to Plaintiffs by December 31, 2024 as promised in the December 18 Email; and
- d. The reasons why payment was not made to Plaintiffs by January 17, 2025 as promised in the January 6 Email.

3. The corporate representative(s) shall be prepared to testify as to each corporate defendants' understanding and interpretation of Sections 5.5(a)(iii) and 7.9 of the Equity Purchase Agreement and why defendants believe those provisions have or have not been breached.

Judge Elanor G. Tennyson